

**IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF DELAWARE**

**VALYANT AI, INC., a Colorado
corporation,**

Plaintiff,

v.

HI AUTO, INC., a Delaware corporation,

Defendants.

CA No.

DECLARATION OF ROB CARPENTER

1. I am over 18 years of age and I am the Chief Executive Officer of Valyant AI, Inc., the plaintiff in this action. I have personal knowledge of the facts contained herein, except as to where stated upon information and belief, and as to those facts I am informed and believe that they are correct and accurate. If called upon as a witness I could and would competently testify as to the facts contained in this declaration. I make this declaration in support of Valyant AI, Inc.'s complaint.
2. On November 17, 2021 I was informed by a representative of a Hi Auto, Inc. client, whom I spoke to by telephone, that Hi Auto, Inc. uses call centers to back up their artificial intelligence (AI) system.
3. I was informed by the same representative that Hi Auto, Inc. provides to its clients regular reports that outline the use of call centers for backup support.

I hereby declare that the above statements are true and correct to the best of my knowledge and belief, and that this declaration is subject to penalty of perjury under the laws of the United States of America.

Executed on November 24, 2021 /s/Rob Carpenter/